

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Richard Thomas Kontir,

Debtor.

Case No. 23-11010-PMM

Chapter 13

Debtors' Motion to Modify Chapter 13 Plan


AND NOW, Debtor Richard Thomas Kontir, by and through his attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under Chapter 13 on April 6, 2023.
2. The trustee in this case is Scott F. Waterman.
3. The plan was confirmed on August 1, 2024.
4. Creditor QNB Bank recently filed a Motion for Relief From the Automatic Stay ("MFR") with respect to the debtor's home stemming from missed post-petition payments.
5. Per the approved stipulation settling the MFR, the Debtor wants to amend his plan to roll in the post-petition arrears.
6. The proposed plan cures the post-petition arrears listed in the MFR by increasing the Debtor's monthly plan payments moving forward.
7. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 90 as the new confirmed plan.
8. The Debtor will soon file a supplemental Schedule J as evidence of the Debtor's ability to fund the new plan.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in their favor as may be necessary and proper under the law.

Date: January 29, 2025

CIBIK LAW, P.C.
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